



**STATEMENT OF BASIS**  
**Page 1 of 2**  
BAQ Engineering Services Division

**Company Name:** South Carolina Electric & Gas Company – A.M. Williams Station  
**Permit Number:** 0420-0006-CL

**Permit Writer:** Sheila Watts  
**Date:** DRAFT

**DATE APPLICATION RECEIVED:** September 30, 2015

**DATE OF OCRM APPROVAL:** October 15, 2015

**FACILITY DESCRIPTION** A.M. Williams Station is an electric utility steam generating plant operated by South Carolina Electric & Gas Company (SCE&G), a wholly-owned subsidiary of SCANA Corporation. The facility has a primarily coal-fired main boiler, two fuel oil-fired auxiliary boilers, and several small internal combustion turbines. Ancillary processes include coal, ash, gypsum, and limestone handling systems.

**PROJECT DESCRIPTION** The two fuel-oil fired auxiliary boilers at the facility are subject to 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The facility is requesting a federally enforceable annual average capacity factor of equal to or less than 10% for each of the two fuel oil-fired auxiliary boilers to meet the Subpart DDDDD definition of a limited use boiler (see 40 CFR §63.7575). The facility is also requesting a federally enforceable sulfur content limit of 0.0015% by weight for No. 2 fuel oil in burned facility equipment (main boiler, auxiliary boilers, and combustion turbines). The requests will be processed through issuance of a synthetic minor construction permit.

**COLLOCATION DETERMINATION** The SCE&G-Bushy Park LNG facility operates under Title V permit number TV-0420-0048. Although SCE&G-Bushy Park LNG facility has a different SIC code than SCE&G - A.M. Williams facility, the SCE&G - A.M. Williams facility is major for HAPs and Title III collocation criteria considers only adjacency and common control. Therefore, the SCE&G-Bushy Park LNG facility has been deemed to be collocated with SCE&G - A.M. Williams. If the holding company for SCE&G and SCANA ever divests itself of one of these adjacent plants, the collocation status would be altered and the SCE&G-Bushy Park LNG facility would be able to operate under a state minor air permit. Since the two are collocated facilities, modeling demonstration for Standards 2 and 7 must include emissions from both facilities.

**CHANGES SINCE LAST OP ISSUANCE** There have been several exemption letters processed for the facility. Construction permits for the installation of a Chem-Mod coal fuel modification system (0420-0006-CJ) and for the installation of a portable Activated Carbon Injection (ACI) system (0420-0006-CK) have been issued. The Department is currently in the process of issuing a renewed Title V and Title IV for the facility. Permits 0420-0006-CJ and 0420-0006-CK, along with the synthetic minor limits imposed by this synthetic minor construction permit will be incorporated into the draft Title V for the facility, prior to public notice.

**SPECIAL CONDITIONS, MONITORING, LIMITS** Issuance of this permit will involve a synthetic minor limit of annual average capacity factor of equal to or less than 10% for each of the two fuel oil-fired auxiliary boilers that will be added to the NESHAP-Conditions portion of this synthetic minor construction permit. Also, a facility wide synthetic minor limit of sulfur content limit of 0.0015% by weight for No. 2 fuel oil will be added to this synthetic minor construction permit.

**EMISSIONS**

Emissions in the facility's updated TV renewal application dated October 1, 2013 and revision dated August 21, 2015, along with the construction application dated September 2015 have been reviewed for accuracy. The facility wide emissions below include emissions from Construction Permits 0420-0006-CJ and 0420-0006-CK and take into account the synthetic minor limits imposed by issuance of this construction permit (0420-0006-CL).

FACILITY WIDE EMISSIONS (does not include emissions from insignificant activities)		
Pollutant	Uncontrolled Emissions	Controlled/Limited Emissions
	TPY	TPY
PM (filterable)	115,697	398
PM <sub>10</sub> (filterable)	26,631	109
PM <sub>2.5</sub> (filterable)	6,962	75
PM (total condensables)	2,479	-----
SO <sub>2</sub>	55,418	17,741
NO <sub>x</sub>	16,964	4,678*
CO	1,133	-----
VOC (non-speciated)	65.32	-----
Lead (Pb)	0.44	-----



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**Page 2 of 2**  
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<b>FACILITY WIDE EMISSIONS (does not include emissions from insignificant activities)</b>		
<b>Pollutant</b>	<b>Uncontrolled Emissions</b>	<b>Controlled/Limited Emissions</b>
	<b>TPY</b>	<b>TPY</b>
Single Greatest HAP (hydrogen chloride)	1200	-----
Total HAPs	1360	-----

\*For informational purposes, the NO<sub>x</sub> controlled/limited emissions reflect the operation of a selective catalytic reduction control (SCR) device which is currently considered a voluntary control device.

**OPERATING PERMIT STATUS**                      The facility operates under a Title V permit issued June 18, 2009.

**REGULATORY APPLICABILITY REVIEW**      The changes, since the last Title V was issued (June 18, 2009), in regulatory applicability for the facility are applicability to Section II. E – Synthetic Minor regulation, NSPS 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Combustion Engines, NESHAP 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, and NESHAP 40 CFR 63, Subpart UUUUU - National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units (see Table below). Permit conditions related to NSPS 40 CFR 60 Subpart IIII and NESHAP 40 CFR 63, Subpart UUUUU will be included in the Title V renewal that is currently in draft form.

<b>Regulation</b>	<b>Comments/Periodic Monitoring Requirements</b>
Section II.E - Synthetic Minor	Applicable. The facility is requesting synthetic minor limits for the auxiliary boilers in order to meet the 40 CFR §63.7575 definition of a limited use boiler and a facility wide synthetic minor limit on the sulfur content by weight on No. 2 fuel oil.
40 CFR 60 and 61-62.60	Applicable. The facility has emission units that are subject to SC Regulation 61-62.60 and NSPS Subparts A, Y, IIII, and OOO. All the existing diesel generators, except for the 202 Hp and 175 kW emergency generators, located at this facility were installed prior to the applicability dates of this regulation and are therefore not subject to Subpart IIII. The 202 Hp emergency generator and the 175 kW emergency diesel generator listed as insignificant activities were installed after the applicability dates of this regulation and are therefore subject to Subpart IIII.
40 CFR 63 and 61-62.63	Applicable. The facility has existing units subject to Subpart UUUUU – NESHAP: Coal- And Oil-Fired Electric Utility Steam Generating Units. The facility has existing units subject to Subpart DDDDD - NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The diesel engines are subject to Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants: Stationary Reciprocating Internal Combustion Engines.

**AMBIENT AIR STANDARDS REVIEW**

<b>Regulation</b>	<b>Comments/Periodic Monitoring Requirements</b>
Standard No. 2	Applicable. This facility has demonstrated compliance through modeling; see modeling summary dated October 27, 2015.
Standard No. 7.c	This facility has demonstrated compliance with Ambient Air Increments through modeling; see modeling summary dated October 27, 2015.
Standard No. 8 (state only)	Not Applicable. TAPs from burning virgin fuel and spec oil are not subject to this regulation.

**PUBLIC NOTICE**

This construction permit(s) will undergo a 30-day public notice period to establish synthetic minor limits in accordance with SC Regulation 61-62.1, Section II.N. This permit(s) was placed on the SCDHEC Public Notice Website on December 14, 2015. The comment period was open from December 14, 2015 to January 12, 2016.

**ADDITIONAL PUBLIC PARTICIPATION**

**SUMMARY AND CONCLUSIONS**

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.